

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

| | | |
|--|---|------------------------|
| BOBBY MORRIS, individually and on |) | |
| behalf of all others similarly situated, |) | |
| |) | CASE NO. 4:25-CV-00066 |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| SAFILO AMERICA, INC. D/B/A |) | |
| BLENDERS EYEWEAR |) | |
| |) | |
| Defendant. |) | |

**THIRD CONSENT MOTION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), and with the consent of Plaintiff, Defendant Safilo America, Inc. (“Safilo”) respectfully moves this Court for an extension of time up to and including June 6, 2025 to answer, move, or otherwise respond to the complaint in this action. In support, Safilo states as follows:

1. On January 16, 2025, Plaintiff filed a Complaint against Safilo in the above-captioned action. Doc. 1.
2. Safilo’s response to the Complaint is currently due April 7, 2025. Doc. 9.
3. The parties have been in ongoing discussions regarding Plaintiff’s claims and Safilo’s defenses. As a result, Safilo is currently seeking information from third parties that may help the parties to resolve, narrow, or otherwise expedite the litigation of Plaintiff’s claims.
4. Safilo respectfully requests an additional 60 days to answer, move, or otherwise respond to the Complaint. Safilo requests this time so it may complete its outreach to and conversations with these third parties, review and analyze information provided, and then discuss

the matter further with Plaintiff, again with the goal of resolving, narrowing, or otherwise expediting the litigation of his claims.

5. Counsel for Safilo spoke with counsel for Plaintiff on March 25, 2025, and Plaintiff consents to this request.

6. This request is made in good faith and not for purposes of delay, and no party will be prejudiced should this request be granted.

7. This is the third extension of time Safilo has sought in this action.

WHEREFORE, for the foregoing reasons, Safilo respectfully requests that this Court issue an Order granting this consent motion and extending Safilo's time to answer, move, or otherwise respond to the Complaint through and including June 6, 2025.

Dated: April 1, 2025

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*Attorneys for Defendant Safilo American, Inc.
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on April 1, 2025, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing on all parties of record.

s/ Marisa L. Saber

Marisa L. Saber, Esquire